

**Before the
Federal Communications Commission
Washington, D.C. 20554**
In the Matter of
Petition for a Notice of Inquiry Regarding 911
Call-Forwarding Requirements and Carriers'
Blocking Options for Non-Initialized Phones

PS Docket No. 08-51

1. Rules should be enacted to require all new NSI devices to provide their telephone number to 911 or provide a call back feature. This should apply only to calls to 911 or other government agencies. Customers should retain the ability to call private businesses without their telephone number being divulged.
2. Subject to items 3-5 below, carriers should be required to transmit all 911 calls to 911 call centers, regardless of whether the caller validation is possible and regardless of whether the handset has code identifiers.
3. Carriers should also be required to identify the calls that lack caller validation, code identifiers, etc., to the 911 call center and to cooperate fully with all efforts by the 911 call center to prioritize calls accordingly.
4. When a 911 call receives more calls than its staff can simultaneously answer, it should give the highest priority to answering calls that are most likely to be true emergencies and the lowest priority to answering calls that are most likely to be fraudulent.
5. If a 911 call center with multiple telephone lines designates, for example, some lines for calls from handsets with code identification and other lines for calls from handsets without code identification, carriers should be required to route calls accordingly. This will enable the 911 call center to instruct its employees to answer the calls to the lines that receive the calls to lines designated for calls most likely to be true emergencies first, and to answer calls to lines designated for calls likely to be fraudulent only when no other calls are waiting to be answered.
6. It is not possible to prevent fraudulent 911 calls by blocking those that originate at NSI handsets. Even if fraudulent calls from cellular telephones were completely eliminated, persons wishing to make fraudulent 911 calls could do so from public coin-operated telephones.
7. Rules should be enacted to require all new NSI devices (1) to have either GPS (global positioning system) chips or a "LoJack" type technology, (2) to begin transmitting their location when a call to 911 is placed, and (3) to continue transmitting their location until either the 911 call center or the responding law enforcement agency determines either (a) both that the call was legitimate and that the

emergency situation has been resolved, (b) both that the call was fraudulent and that the caller has been apprehended, or (c) both that the call was fraudulent and that no police officer is available to apprehend the caller. Use of either “GPS” or “LoJack” type technology to locate 911 callers would also enable responders to reach callers who are attempting to report true emergencies, but are unable to report their location, such as those who lose consciousness before the call is answered or do not know their location, in addition to aiding in the apprehension of fraudulent callers. To avoid apprehension, callers would need to abandon the handsets before law enforcement arrived at the handset’s location. Due to the cost of the devices, this is unlikely to occur frequently.

8. The solution to the problem of determining who is responsible for a 911 call, whether fraudulent or a true emergency, especially when multiple persons may use the same telephone, begins with sending law enforcement personnel to the telephone, where they can question the caller, and take appropriate action. In cases where an unauthorized person is using a telephone to place 911 calls, this would be determined by the law enforcement personnel when they found the caller. This applies to all 911 calls, including those from landlines, and is not unique to NSI devices.
9. Tracing the location of the handset, through “GPS”, “LoJack”, or other technical means is superior to call blocking, in three ways: First, it does not block any legitimate calls, even those placed from a telephone previously used fraudulently. Second, it aids the emergency personnel responding to a legitimate call in their efforts to locate the emergency. Third, it aids in the apprehension of fraudulent callers.
10. In cases where non-emergency 911 calls are determined to come from a child too young to face criminal charges, the child’s parents should be alerted and ordered to keep the telephone in the parent’s pocket or secured out of the child’s reach, except when it is actually in use by the parent, rather than leaving it in a location that the child can access.